

Bayer Environmental Science

460109-00



June 6, 2003

VIA FEDEX

Document Processing Desk (REG)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA. 22202-4501

Attention: Mr. Dan Kenny
PM Insecticide/Rodenticide Branch

RE: Submission of Supporting Data:
Premise Perimeter 2
EPA Reg. No. 432-RGTO
Premise Perimeter 0.5SC
EPA Reg. No. 432-RGIN
Premise Perimeter 75
EPA Reg. No. 432-RGIR

Bayer Environmental Science

95 Chestnut Ridge Road
Montvale, NJ 07645
Tel. 201 307 9700
Fax 201 307 3438

Dear Mr. Kenny:

Bayer Environmental Science is submitting supporting data for the registration of the products referenced above. Specifically we enclose the following documents (four copies):

1. Soil Residues of Premise Termiticide at the Bayer Tifton, Georgia Research Farm, (1995-2000). A. Krygsman. Laboratory Project ID No.: 072-95-032. 136 pages.

MRID No.: **Reject (01)**

2. The Effect of Soil Type on the Termiticidal Activity of Premise 75 (Imidacloprid) Against Reticulotermes Hesperus and Heterotermes aureus. M.K. Rust, D.A. Reiersen, and D. Hawks. Laboratory Project ID No.: I-ST-94-7. 17 pages.

MRID No.: **46010902**

3. Threshold of Feeding Inhibition of Imidacloprid against Eastern Subterranean Termites. D. Price, T. Powell and J. Carter. Laboratory Project ID No.: VBL-97-6198. 18 pages.

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MRID No.: 46010903

4. Threshold of Feeding Inhibition of Imidacloprid against Eastern Subterranean Termites. D. Price, T. Powell and J. Carter. Laboratory Project ID No.: VBL-97-6197. 18 pages.

MRID No.: 46010904

5. Field Studies with Premise in Hawaii 1994-2000, Penetration and Cumulative Mortality. A. Krygsman. Laboratory Project ID No.: 077-94-00023. 36 pages.

MRID No.: 46010905

6. USDA/FS Ten-Year Progress Report NTN 33893 Treatments to Soil For Control of Subterranean Termites. A. Krygsman. Laboratory Project ID No.: 4510, FS-SRS-4502-4.206. 25 Pages.

MRID No.: 46010906

7. LC50 and 90 Determination of Imidacloprid Using Reticulotermes virginicus. A. Krygsman. Laboratory Project ID No.: USA03A001. 12 Pages.

MRID No.: 46010907

8. LC50 and 90 Determination of Imidacloprid Using Reticulotermes flavipes. A. Krygsman. Laboratory Project ID No.: USA03A001, KDM03I01. 12 Pages.

MRID No.: 46010908

Also included find four (4) copies of revised product labeling for each of the products referenced above. Please note that this information has also been provided to the ASCPRO Label Review Committee for their review and we are working with them on the preparation for an experimental use program in the perimeter area. Additional data pertaining to a consumer survey, bioassays and transfer data are being finalized and will be forwarded to your attention as they become available. As indicated during our meeting with the ASCPRO Board of Directors this past February (NPMA Legislative Days) this is part of our approach to address a time-limited registration for these applications.

Please contact me should there be any questions regarding this submission. I can be reached via phone or email (201-307-6884 or Adrian.Krygsman@BayerCropscience.com). Thank you.

Sincerely,


Adrian Krygsman

Manager, Registration

Cc: J. Conti
C. Cole
S. Burt
P. Farno
B. Reid
Chron.